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51
52 UNITED STATES DISTRICT COURT
 53 **NORTHERN DISTRICT OF CALIFORNIA**

54 ANIBAL RODRIGUEZ, JULIEANNA
 55 MUNIZ, ELIZA CAMBAY, SAL
 56 CATALDO, EMIR GOENAGA, JULIAN
 57 SANTIAGO, HAROLD NYANJOM,
 58 KELLIE NYANJOM, and SUSAN LYNN
 59 HARVEY, individually and on behalf of all
 60 others similarly situated,

61 Plaintiffs,

62 vs.

63 GOOGLE LLC,

64 Defendant.

65 Case No.: 3:20-cv-04688

66 **DECLARATION OF ALEXANDER P.**
FRAWLEY IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF OPPOSITION TO
GOOGLE'S MOTION TO DISMISS OR
STRIKE PORTIONS OF SECOND
AMENDED COMPLAINT

67 The Honorable Richard Seeborg
 68 Courtroom 3 – 17th Floor
 69 Date: August 19, 2021
 70 Time: 1:30 p.m.

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

3 1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in
4 this matter. I am an attorney at law duly licensed to practice before all courts of the State of New
5 York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the
6 matters set forth herein and am competent to testify.

7 2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs'
8 administrative motion to seal portions of the Opposition to Google's Motion to Dismiss or Strike
9 Portions of the Second Amended Complaint (the "Opposition"). The Opposition references
10 material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential
11 – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 70).

12 3. Plaintiffs respectfully request that the Court seal the redacted portions of the
13 Opposition, attached hereto as Exhibit A.

14 4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a
15 declaration within 4 days establishing that all of the designated material is sealable.

16 5. I personally served a copy of this Declaration on Google's counsel of record by email
17 on July 16, 2021. A Proof of Service is attached hereto as Exhibit B.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct. Executed this 16th day of July, 2021, at New York, New York.

/s/ Alexander P. Frawley